



**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 13-1

February 1, 2022

In the Matter of Telrite Corporation d/b/a Life Wireless Petition for Limited Designation as an Eligible Telecommunications Carrier in Massachusetts for the Limited Purpose of Offering Wireless Lifeline Service to Qualified Households.

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**SECOND SET OF INFORMATION REQUESTS BY THE  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE  
TO TELRITE CORPORATION D/B/A LIFE WIRELESS**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable ("Department") submits to Telrite Corporation d/b/a Life Wireless the following information requests:

Instructions

The following instructions apply to this set of information requests, and all subsequent requests issued by the Department in this proceeding.

1. Unless otherwise stated, each request should be answered in writing and include: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as soon as they are completed.
3. All answers should be filed with the Department by the close of business on February 15, 2022.
4. The term "Telrite" means Telrite Corporation d/b/a Life Wireless and its corporate predecessors, agents, officers, employees, and assigns.

5. The term “affiliate” means a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, Telrite. For purposes of this definition, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.
6. The term “provide complete and detailed documentation” means: provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions Telrite used in developing the projections or estimates.
7. The term “ETC” means eligible telecommunications carrier.
8. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, legal filings, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
9. Requests shall be deemed continuing so as to require further supplemental responses if Telrite and/or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
10. If any of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

### Requests

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| D.T.C. 2-1 | Refer to updated Attachments 7 and 8. Provide the ‘device unlocking’ policy referred to at the end of each of the attachments.  |
| D.T.C. 2-2 | Refer to updated D.T.C. 1-24. Explain how Telrite informs customers of international service limitations and provide any proposed marketing material disclosing the limitation on international calling.                        |
| D.T.C. 2-3 | Refer to updated D.T.C. 1-36. Describe Telrite’s second layer of internal review, including any additional data sources used to verify Lifeline customers.  |
| D.T.C. 2-4 | Refer to updated D.T.C. 1-39. Describe how AT&T’s proposed 3G network retirement will affect Telrite customers. Provide any plans Telrite has to communicate with those customers about the retirement and any plans to provide |

customers with devices that will be compatible with AT&T's network post-retirement.

- D.T.C. 2-5 Refer to updated D.T.C. 1-31, 47 U.S.C. § 214(e)(1)(B), and 47 C.F.R. § 54.201(d)(2). Explain whether Telrite considers social media “media of general distribution” and why.
- D.T.C. 2-6 Refer to updated D.T.C. 1-3 and updated Attachment 2(b). Describe how Telrite has complied with the Nebraska Public Service Commission (“NPSC”) directives since the settlement between Telrite and the NPSC. Please also provide any update regarding any disputes between Telrite and the NPSC since the settlement agreement.
- D.T.C. 2-7 Provide any updates regarding Telrite’s petition to be a Lifeline-only ETC in New Jersey.